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Attorney for Defendant  
Cody Cramer

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	) Case No. 2:21-cr-155-JAM
Plaintiff,	)
vs.	) <b>STIPULATION AND ORDER TO CONTINUE</b>
	) <b>STATUS CONFERENCE AND EXCLUDE TIME</b>
JOSHUA WILSON and	) Date: December 6, 2022
CODY CRAMER,	) Time: 9:30 a.m.
Defendants.	) Judge: Hon. John A. Mendez

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody Cramer that the status hearing currently set for December 6, 2022, at 9:00 a.m., be continued to March 21, 2023, at 9:00 a.m.

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on December 6, 2022, at 9:00 a.m.
2. By stipulation, Mr. Cramer and Mr. Wilson now move to continue the status conference to March 21, 2023, at 9:00 a.m.
3. A considerable amount of discovery and numerous videos have been produced to

1 date.

- 2 4. Mr. Cramer and Mr. Wilson require additional time to review the discovery,  
3 investigate and research possible defenses, research potential pretrial motions, and  
4 explore potential resolutions to the case, and otherwise prepare for trial.
- 5 5. Mr. Cramer and Mr. Wilson believe that failure to grant the requested continuance  
6 would deny them the reasonable time necessary for effective preparation, taking  
7 into account the exercise of due diligence.
- 8 6. Neither the government nor Mr. Wilson object to the continuance.
- 9 7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial  
10 Act), the parties request that the time period between February 8, 2022 and April  
11 19, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. §  
12 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance  
13 granted by the Court at the defense's request, based on a finding that the ends of  
14 justice served by granting the continuance outweighs the best interest of the  
15 public, Mr. Wilson, and Mr. Cramer in a speedy trial.

16 Respectfully submitted,

17  
18 Date: November 30, 2022

/s/ Kyle R. Knapp  
Kyle Knapp  
Attorney for Mr. Cramer

20 HEATHER E. WILLIAMS  
21 Federal Defender

22 Date: November 30, 2022

/s/ Hootan Baigmohammadi  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Mr. Wilson

25 Date: November 30, 2022

PHILLIP A. TALBERT  
United States Attorney

26  
27 /s/ James R. Conolly  
James R. Conolly  
Assistant United States Attorney  
28 Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: December 1, 2022

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE